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Attorneys for Fundación Rafael del Pino

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS, INC., et al.

08-13555 (JMP)

Debtors.

(Jointly Administered)

DECLARATION OF EUSEBIO VIDAL-RIBAS MARTI IN OPPOSITION TO THE FOUR HUDRED FIFTIETH OMNIBUS OBJECTION TO CLAIMS (PREFERRED SECURITIES CLAIMS)

Eusebio Vidal-Ribas Martí, of full age, declares pursuant to 28 U.S.C. § 1746 that:

- 1. I am a member of the Board of Trustee of Fundación Rafael del Pino (the " Fundación") and familiar with its records and transactions.
- 2 The Fundación purchased securities in Lehman Brothers UK Capital Funding LP ("the Preferred Securities") for €1,920,000 from Banco Santander Central Hispano, S.A. on or about July 28, 2005.



- 3. In deciding to acquire the Preferred Securities, the Fundación believed the issuer was obligated to repay the Preferred Securities and this was guaranteed by Lehman Brothers Holdings plc.
- 4. The Fundación was told that the Preferred Securities had the backing of "Lehman," which it understood to be the ultimate US parent, Lehman Brothers Holdings, Inc. ("LBHI"). LBHI had issued, by Unanimous Written Consent of the Executive Committee of the Board of Directors of Lehman Brothers Holdings, Inc. dated June 9, 2005 ("the June 9, 2005 Guarantee"), a guarantee of obligations of various subsidiaries, including those of Lehman Brothers Holdings plc, the named guarantor of the Preferred Securities.
- 5. As the issuer failed to pay the Preferred Securities, and they were backed by LBHI, the Fundación filed proof of claim No. 57540 against LBHI for the entire amount of its investment.

I hereby declare that under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on Madrid, at 01-16-2014.

Eusebio Vidal-Ribas Martí